

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

KAREN WHITE,)	
)	
Plaintiff,)	
)	
v.)	Civil No. 3:12CV115-MHL
)	
)	
BMW of NORTH AMERICA, LLC,)	
)	
Defendant.		

PLAINTIFF'S SECOND SET OF MOTIONS IN LIMINE

COMES NOW the Plaintiff, Karen White, and files the following Motions in Limine, requesting this Honorable Court

- (1) strike the Defendant's expert report and exclude all testimony, reports and documents regarding the matters set forth in the expert's report, and to enter an order prohibiting the Defendant, Defendant's counsel, or any of the Defendant's witnesses from mentioning, either directly or indirectly, in response to the Defendant's suggestion or otherwise, information contained in such report; and
- (2) enter an order prohibiting the defendant's expert from testifying on any fact or issue regarding valuation of the automobile that is the subject of this lawsuit.

For the reasons set forth fully in the accompanying memorandum in support of this motion, the Plaintiff respectfully requests this Court to grant her two Motions in Limine.

Respectfully Submitted,

Karen White

/s/

Leonard A. Bennett, Esq.

CONSUMER LITIGATION ASSOCIATES, P.C.

VS#37523

763 J. Clyde Morris Blvd Suite 1-A

Newport News, Virginia 23601

Phone: (757) 930-3660

Fax: (757) 930-3662

CERTIFICATE OF SERVICE

I hereby certify that on August 27, 2012, I electronically filed the foregoing via the CM/ECF System, which will notify the following counsel of record:

Christopher James Dalton

Buchanan Ingersoll & Rooney PC (NA-NJ)

550 Broad Street

Suite 810

Newark, NJ 07102

Rachel Jane Elsby

Buchanan Ingersoll & Rooney PC (VA)

1737 King St

Suite 500

Alexandria, VA 22314-2727

Rosemary Joan Bruno

Buchanan Ingersoll & Rooney PC (NA-NJ)

550 Broad Street

Suite 810

Newark, NJ 07102

Anne Burris

Buchanan Ingersoll & Rooney PC (NA-NJ)

550 Broad Street

Suite 810

Newark, NJ 07102

James DeRose

Buchanan Ingersoll & Rooney PC (NA-NJ)

550 Broad Street

Suite 810
Newark, NJ 07102

/s/

Leonard A. Bennett, Esq.
VSB #37523
763 J. Clyde Morris Blvd Suite 1-A
Newport News, Virginia 23601
Phone: (757) 930-3660
Fax: (757) 930-3662